

**DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
RENEWABLE OPERATING PERMIT APPLICATION  
STAFF REPORT  
June 5, 2000**

**Facility**

Wolverine World Wide Inc.  
Factory 24B Big Rapids  
1005 Baldwin Street  
Big Rapids, MI 49307

SRN: B2981


**Purpose**

Major stationary sources of air pollutants are required to obtain and operate in compliance with a Renewable Operating (RO) Permit pursuant to Title V of the Federal Clean Air Act of 1990 and Michigan's administrative rules for air pollution control pursuant to Section 5506(1) of Article II, Chapter I, Part 55 of P.A. 451 of 1994. Major stationary sources are defined by criteria in administrative rule R 336.1211(1). The RO Permit is intended to simplify and clarify a facility's applicable requirements and compliance with them by consolidating all state and federal air quality requirements into one document.

This report, as required by R 336.1214(1), sets forth the applicable requirements and factual basis for the draft permit terms and conditions including citations of the applicable requirements, an explanation of any equivalent requirements included in the draft permit pursuant to R 336.1212(6), and any determination made pursuant to R 336.1213(6)(a)(ii) regarding requirements that are not applicable to the stationary source.

**General Information**

Facility Mailing Address:	123 N. Main Street, Rockford, MI 49351
Source Registration Number (SRN):	B2981
Standard Industrial Classification Code (SIC):	3143
# of Facility Sections:	1
Application #:	199600222
Responsible Official:	Mr. Gary Fountain, VP Domestic Manufacturing, 616-866-5500
AQD Permit Contact Person:	Lawrence Schultz, Environmental Engineer 616-356-0237
Date Permit Application Submitted:	October 2, 1996
Date Application Administratively Complete:	October 15, 1996
Is Application Shield in Effect?:	Yes
Date Public Comment Begins:	June 5, 2000
Deadline for Public Comment:	July 5, 2000

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### **Source Description**

Wolverine World Wide is a manufacturer of leather shoes and boots with a manufacturing facility located in Big Rapids, Michigan. The manufacturing facility ( Factory 24B) is located at 1005 Baldwin Street with some residential homes directly across the street from the facility. Many pieces of equipment and processes are utilized. They include, but are not limited to, the following: sewing, cutting, sanding, roughing, coating, adhesive, dyeing, washing and molding.

Wolverine World Wide manufactures various types of leather shoes and boots in Factory 24B. The process involves heat forming a leather upper, attaching the toe to the insole, attaching the entire upper to the insole, cementing the midsole to the assembled upper, cementing the outsole to the midsole, conditioning of the assembled shoe or boot, and packaging. Heat forming is used to form the heel of the leather upper and the cushion/insulation or leather of the toe.

Exhausts from various equipment throughout the plant such as spray booths, cementing and adhesive operations, and conditioning operations are vented through dry fabric filters. The volatile organic compound (VOC) emissions are then vented externally to the ambient air through stacks. Particulate emissions created by various equipment throughout the plant such as trimmers, buffers, sanders, and grinders are exhausted from a plant-wide dry dust collector and a plant-wide wet dust collector.

The following tables list facility-wide emission information as estimated for 1998.

**TOTAL FACILITY EMISSIONS-Criteria Pollutants**

<b>Pollutant</b>	<b>Tons per Year</b>
Particulate Matter (PM)	14
Volatile Organic Compounds (VOCs)	60
Volatile Hazardous Air Pollutant (VHAPs)	27

**TOTAL FACILITY EMISSIONS-Hazardous Air Pollutants (HAPs)**

<b>Pollutant</b>	<b>Tons per Year</b>
Volatile Hazardous Air Pollutant (VHAPs)	27

See Sections C and D in the enclosed draft RO Permit for summary tables of all processes at the facility that are subject to process-specific emission limits or standards in any applicable requirement.

### **Regulatory Analysis**

The facility is located in Mecosta County, which is currently designated as attainment/unclassified for all criteria pollutants, and is not subject to R 336.1220. The facility is considered a major Title V 40 CFR Part 70 source due to potential to emit of volatile organic compounds exceeding 100 tons per year. The facility is considered a 'synthetic minor' source in regards to Prevention of Significant Deterioration (PSD) (40 CFR 52.21) regulations since the facility has accepted legally enforceable permit conditions limiting the potential to emit of volatile organic compounds to below 250 tons.

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It is considered a major source of hazardous air pollutant (HAP) emissions because the potential to emit of any single hazardous air pollutant regulated by the Clean Air Act, Section 112 is greater than 10 tons per year and the potential to emit of all hazardous air pollutants combined are greater than 25 tons per year.

The permitted coating operations are subject to R336.1702 and Best Available Control Technology (BACT). High volume low pressure (HVLP) applicators were installed where feasible. Part 6 rules are not applicable since there are no standards defining emission limitations that apply to any process at this facility. The permitted coating operations are not subject to R336.1230 toxic analysis since no new processes have been installed since April, 1992.

Please refer to Section E and Section F in the enclosed draft permit for detailed regulatory citations for each Emission Unit at the facility. Section A contains regulatory citations for General Conditions.

### **Equivalent Requirements**

This permit does not include any equivalent requirements or significant changes pursuant to R 336.1212(6). Equivalent requirements are enforceable applicable requirements that are equivalent to the applicable requirements contained in the original New Source Review permit or Consent Order/Judgment.

### **Non-applicable Requirements**

Section G of the draft RO Permit lists requirements that are **not** applicable to this source as determined by DEQ-AQD, if any were proposed in the application. These determinations are incorporated into the permit shield provision set forth in Part A (conditions 30 through 33) of the draft RO Permit pursuant to R 336.1213(6)(a)(ii).

### **Processes in Application Not Identified in Draft RO Permit**

The following table lists processes that were included in the RO Permit application as exempt devices under R 336.1212(3). These processes are not subject to any process-specific emission limits or standards in any applicable requirement.

<b>Applicant's (Operator's) Device ID</b>	<b>Applicant's Description of Process</b>	<b>RO Permit Exemption Rule</b>	<b>NSR Permit Exemption Rule</b>
DV-BOILER- 877MBH	877,000 Btu/hr boiler	(R336.1212(3))	(R336.1282(a))
DV-BOILER - 10MMBH	10 mmBtu/hr boiler	(R336.1212(3))	(R336.1282(a))

### **Draft RO Permit Terms/Conditions Not Agreed to by Applicant**

This permit does not contain any terms and/or conditions that the DEQ-AQD and the applicant did not agree upon pursuant to R 336.1214(2). If the person and the DEQ-AQD cannot agree upon terms and conditions of a draft RO Permit, the terms and conditions that the DEQ-AQD believes are necessary to comply with the requirements of R 336.1213 shall be incorporated into the RO Permit.

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### **Facility Compliance Status**

The DEQ-AQD finds that the facility is expected to be in compliance with all applicable requirements as of the date of issuance of this RO Permit.

### **Preliminary Findings**

The Department of Environmental Quality, Air Quality Division (DEQ-AQD) has made a preliminary determination for approval of the draft RO Permit No.199600222, subject to the terms and conditions outlined in the draft permit. A final decision on the RO Permit will not be made until the public has had an opportunity to comment on the DEQ-AQD's preliminary determination and draft permit. In addition, the United States Environmental Protection Agency (EPA) is allowed up to 45 days to review the draft permit and related material. The DEQ-AQD is not required to accept recommendations that are not based on applicable requirements. The delegated decision maker for DEQ-AQD is Heidi G. Hollenbach, Grand Rapids District Supervisor. The final determination for RO Permit approval/disapproval will be based on the contents of the permit application, a judgment that the facility will be able to comply with applicable emission limits and other requirements, and resolution of any objections by the United States Environmental Protection Agency.